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Attorneys for Debtors and Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

Bankruptcy Case No. 19-30088 (DM)

PG&E CORPORATION,

Chapter 11

- and -

(Lead Case) (Jointly Administered)

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

**DECLARATION OF RICHARD W. SLACK IN FURTHER
SUPPORT OF REORGANIZED DEBTORS' FIFTEENTH
SECURITIES CLAIMS OMNIBUS OBJECTION
(SECURITIES ACQUIRED OUTSIDE SUBJECT
PERIOD)**

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Company
☒ Affects both Debtors

**[Related to Docket Nos. 11343, 11520, 11638, 11809, 12057,
12394]**

** All papers shall be filed in the Lead
Case, No. 19-30088 (DM).*

Date: June 7, 2022
Time: 10:00 a.m. (Pacific Time)
Place: (Tele/Videoconference Appearances Only)
United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

Pursuant to 28 U.S.C. § 1746, I, Richard W. Slack, hereby declare under penalty of perjury and state as follows:

1. I am a member of Weil, Gotshal & Manges LLP, counsel for the debtors and reorganized debtors in the above-captioned action (collectively, the “**Reorganized Debtors**”). I am admitted to this Court *pro hac vice* and respectfully submit this declaration in further support of the *Reorganized Debtors’ Fifteenth Securities Claims Omnibus Objection (Securities Acquired Outside Subject Period)*, dated September 28, 2021 [Docket No. 11343] (the “**Objection**”).

2. Attached as **Exhibit A** is a true and correct copy of Claim No. 102822, received from Franklin F. Oliveros and Zenaida C. Oliveros (the “**Claimants**”) on April 24, 2020.

3. Attached as **Exhibit B** is a true and correct copy of the informal response to the Objection received from the Claimants on October 21, 2021 (the “**Response**”).

4. Attached as **Exhibit C** is a true and correct copy of the Reorganized Debtors’ reply letter to the Response, dated January 19, 2022 (the “**Reply Letter**”).

5. Attached as **Exhibit D** is a true and correct copy of the Reorganized Debtors’ follow-up letter to the Response, dated March 9, 2022 (the “**Follow-up Letter**”).

Executed: May 31, 2022

New York, New York

WEIL, GOTSHAL & MANGES LLP
KELLER BENVENUTTI KIM LLP

By: /s/ Richard W. Slack
Richard W. Slack

Attorneys for Debtors and Reorganized Debtors